

# **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) Renewal**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
-AIR POLLUTION CONTROL DIVISION-**

**Davies Imperial Coatings, Inc.  
1275 State Street  
Hammond, Indiana 46320**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: <b>F089-13932-00295</b>	
Issued by: _____ Ronald L. Novak, Director Hammond Department of Environmental Management	Issuance Date: <u>April 24, 2002</u> Expiration Date: <u>April 24, 2007</u>

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary paint and paper coating manufacturing plant.

Authorized individual:	Donn T. Davies, President
Source Address:	1275 State Street, Hammond, Indiana 46320
Mailing Address:	P.O. Box 790, Hammond, Indiana 46320
SIC Code:	2851 – Paints & Allied Products and 2672 – Paper Coated & Laminated
Source Location Status:	Lake County
County Status:	Attainment/Unclassifiable for CO, NO <sub>2</sub> and Lead, Primary Nonattainment for SO <sub>2</sub> , Moderate Nonattainment for PM <sub>10</sub> , and Severe Nonattainment for Ozone.
Source Status:	Federally Enforceable State Operating Permit (FESOP) Major under Emission Offset Rules; <u>Not</u> 1 of 28 Source Categories listed under 326 IAC 2-2

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

#### EU-01: Paint Manufacturing Operation

This operation includes the manufacturing of water-based & solvent-based industrial paints and water-based & solvent-based traffic paints. This operation includes the following specific production equipment:

Equipment	Equipment ID No.
<i>Traffic Paint Production</i>	
(4) 600 gallon tanks	L1, L2, L3, & L4
(2) 1700 gallon tanks	10 & 11
(1) 2,000 gallon tank	12
(1) 1,400 gallon tank	13
(1) 2,700 gallon tank	14
(1) 300 gallon mixer	G1
<i>Industrial Paint Production</i>	
(1) 210 gallon mixer	G2
(1) 330 gallon mixer	G3
(1) 140 gallon mixer	G5
(2) 540 gallon tanks with one common mixing arm	G7a & G7b

The maximum design rate of pigments added is 0.75 ton per hour. The maximum production of solvent-based and water-based paints is 1 ton per hour of each type of paint.

There is no air pollution control equipment associated with this operation.

#### **EU-02: Water-Based Traffic Paint Manufacturing Operation**

This operation consists of the following process units:

Equipment	Equipment ID No.
(2) 2,000 gallon mixers with one common mixing arm	G8a & G8b
(2) 7,000 gallon raw material tanks	1 & 2
(1) 2,500 gallon tank	5
(1) bulk handling system (silo)	
(1) bag dump station w/ filter	D6

The maximum design rate of pigments handled is 1 ton per hour. The maximum design rate of water-based traffic paint produced is 3.5 tons per hour.

Particulate emissions from the bag dump operation are controlled by a bag filter unit.

#### **EU-03: Paper Coating Manufacturing Operation**

This operation consists of the following process units:

Equipment	Equipment ID No.
(5) 660 gallon mixers	M1, M2, M3, M4, & M5
(5) bag dump stations w/ filters	D1, D2, D3, D4, & D5
(3) 1500 gallon finished product holding tanks	1E, 3E, & 1W
(6) 2700 gallon finished product storage tanks	2E, 4E, 6E, 7E, 2W, & 3W
(1) 2500 gallon blend tank (Rigid Disk Manufacturing Operation)	4W RD

The maximum design rate of raw material bag dumping is 2.5 tons per hour. Emissions from each bag dump station are controlled by a bag filter unit.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (b) Paved and unpaved roads and parking lots with public access.
- (c) Grinding and machining operations with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## GENERAL CONDITIONS

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, HDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by HDEM.

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

This permit does not convey any property rights of any sort, or any exclusive privilege.

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ and HDEM within a reasonable time, any information that IDEM, OAQ and HDEM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and HDEM copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

**B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ and HDEM may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

**B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; and
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.



B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15<sup>th</sup> of each year to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ and HDEM may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall-maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and HDEM upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and HDEM. IDEM, OAQ and HDEM may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

**B.14 Emergency Provisions [326 IAC 2-8-12]**

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and HDEM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027  
(ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

and

HDEM:  
Telephone No.: 219-853-6306  
Facsimile No.: 219-853-6343

Failure to notify IDEM, OAQ and HDEM by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue - Room 304  
Hammond, Indiana 46320

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

- (e) IDEM, OAQ and HDEM may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ and HDEM by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

**B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

**B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]**

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or HDEM determines any of the following:
  - (1) That this permit contains a material mistake.

- (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
- (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or HDEM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or HDEM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or HDEM may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and HDEM and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(40) and 326 IAC 2-7-1(21). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
  - (2) If IDEM, OAQ and HDEM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and HDEM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and HDEM any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

Any such application should be certified by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and HDEM in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

#### B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, HDEM, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]



B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## **SECTION C SOURCE OPERATION CONDITIONS**

### **Entire Source**

#### **Emissions Limitations and Standards [326 IAC 2-8-4(1)]**

##### **C.1 Overall Source Limit [326 IAC 2-8]**

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
  - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
  - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

##### **C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.

- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

### **Testing Requirements [326 IAC 2-8-4(3)]**

#### **C.10 Performance Testing [326 IAC 3-6]**

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and HDEM not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ and HDEM if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.11 Compliance Requirements [326 IAC 2-1.1-11]**

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.12 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

##### **C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

##### **C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]**

- (a) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.
- (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

- (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

**Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

within ninety (90) days from the date of issuance of this permit.

**C.16 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]**

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**C.17 Compliance Response Plan – Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]**

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and HDEM upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]  
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

**C.19 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.

**C.20 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long



as they are available upon request. If the Commissioner or HDEM makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or HDEM within a reasonable time.

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.21 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Hammond Department of Environmental Management  
Air Pollution Control Division  
5925 Calumet Avenue – Room 304  
Hammond, Indiana 46320

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and HDEM on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

**Stratospheric Ozone Protection**

**C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Paint & Paper Coating Manufacturing Operations

#### EU-01: Paint Manufacturing Operation

This operation includes the manufacturing of water-based & solvent-based industrial paints and water-based & solvent-based traffic paints. This operation includes the following specific production equipment:

Equipment	Equipment ID No.
<i>Traffic Paint Production</i>	
(4) 600 gallon tanks	L1, L2, L3, & L4
(2) 1700 gallon tanks	10 & 11
(1) 2,000 gallon tank	12
(1) 1,400 gallon tank	13
(1) 2,700 gallon tank	14
(1) 300 gallon mixer	G1
<i>Industrial Paint Production</i>	
(1) 210 gallon mixer	G2
(1) 330 gallon mixer	G3
(1) 140 gallon mixer	G5
(2) 540 gallon tanks with one common mixing arm	G7a & G7b

The maximum design rate of pigments added is 0.75 ton per hour. The maximum production of solvent-based and water-based paints is 1 ton per hour of each type of paint.

There is no air pollution control equipment associated with this operation.

#### EU-02: Water-Based Traffic Paint Manufacturing Operation

This operation consists of the following process units:

Equipment	Equipment ID No.
(2) 2,000 gallon mixers with one common mixing arm	G8a & G8b
(2) 7,000 gallon raw material tanks	1 & 2
(1) 2,500 gallon tank	5
(1) bulk handling system (silo)	
(1) bag dump station w/ filter	D6

The maximum design rate of pigments handled is 1 ton per hour. The maximum design rate of water-based traffic paint produced is 3.5 tons per hour.

Particulate emissions from the bag dump operation are controlled by a bag filter unit.

### EU-03: Paper Coating Manufacturing Operation

This operation consists of the following process units:

Equipment	Equipment ID No.
(5) 660 gallon mixers	M1, M2, M3, M4, & M5
(5) bag dump stations w/ filters	D1, D2, D3, D4, & D5
(3) 1500 gallon finished product holding tanks	1E, 3E, & 1W
(6) 2700 gallon finished product storage tanks	2E, 4E, 6E, 7E, 2W, & 3W
(1) 2500 gallon blend tank (Rigid Disk Manufacturing Operation)	4W RD

The maximum design rate of raw material bag dumping is 2.5 tons per hour. Emissions from each bag dump station are controlled by a bag filter unit.

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-3] [326 IAC 2-7] [326 IAC 8-1-6]

Total input of volatile organic compounds (VOC) for all operations at this facility, including coatings, dilution solvents, and cleaning solvent, shall be limited to less than twenty-five (25) tons per 12 consecutive month period.

Therefore, the requirements of Emission Offset (326 IAC 2-3), Part 70 Operating Permit Program (326 IAC 2-7) and New Facilities; General Reduction Requirements (326 IAC 8-1-6) do not apply.

Any change which would cause VOC emissions to increase to greater than 25 TPY will require approval prior to the change.

#### D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 2-7]

Hazardous Air Pollutants (HAPs) shall be kept below the following:

- (a) Total input of any one (1) single hazardous air pollutant (HAP) for all operations at this facility shall be kept below ten (10) tons per 12 consecutive month period.
- (b) Total input of any combination of HAPs for all operations at this facility shall be kept below twenty-five (25) tons per 12 consecutive month period. Note that HAPs emission estimates are based on a 2% loss of throughput through Above Ground Storage Tanks 6-9 and the Underground Storage Tank (UST 1).

Therefore, the requirements for Major Sources of Hazardous Air Pollutants (326 IAC 2-4.1-1) and the Part 70 Operating Permit Program (326 IAC 2-7) do not apply.

**D.1.3 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to F089-5435-00295, issued on December 9, 1996 and 326 IAC 6-3-2, the PM from the Paint Manufacturing Operation, Water-Based Traffic Paint Manufacturing Operation and the Paper Coating Manufacturing Operation shall not exceed 10.8 lbs/hr based on the Maximum Process Weight of 4.25 Tons per hour.

The particulate control devices shall be in operation at all times when the particulate facilities are in operation, in order to comply with this limit.

**D.1.4 Particulate Matter (PM)**

Pursuant to F089-5435-00295, issued on December 9, 1996, and in order to comply with Condition D.1.3, the Baghouse 1 used for PM control shall be in operation at all times when the Paper Coating Manufacturing Operation is in operation. The Permittee shall be required to change the bags on this unit, at minimum, every two (2) months as recommended by the manufacturer. Dates of bag changes shall be maintained and made available for inspection upon request by HDEM or IDEM.

**D.1.5 Particulate Matter less than 10 microns in diameter (PM10)**

That pursuant to the Hammond Air Quality Control Ordinance No. 3522 (as amended), PM10 emissions limit shall be set equal to the PM emission limit.

**D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.7 Visible Emissions Notations**

- (a) Visible emission notations of each baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.1.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across each baghouse used in conjunction with the Water-Based Traffic Paint and Paper Coating Manufacturing Operations, at least once per shift when the associated dump station is in operation when venting to the atmosphere. When for any one reading, the pressure drop across each baghouse is outside the following normal ranges:

Unit ID	P range (inches of water)
<i>Water-Based Traffic Paint Manufacturing Operation</i>	
Baghouse 1	2 - 4
<i>Paper Coating Manufacturing Operation</i>	
Baghouse 1	No pressure drop gauge present. Compliance monitoring addressed in Condition D.1.9.
Baghouse 2	4 - 6
Baghouse 3	4 - 6
Baghouse 4	2 - 4
Baghouse 5	2 - 4

or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan – Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned ranges is not a deviation from this permit. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure drop shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ and HDEM and shall be calibrated at least once every six (6) months.

#### D.1.9 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the Water-Based Traffic Paint and Paper Coating Manufacturing Operations when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.

#### D.1.10 Broken or Failed Bag Detection

In the event that bag failure has been observed:

- (a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B- Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C – Compliance Response Plan – Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

#### **Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

##### **D.1.11 Volatile Organic Compound (VOC)**

That the Permittee shall maintain a monthly record of the following:

- a) Total quantity of solvent-based paint produced.
- b) Total quantity of water-based paint produced.
- c) Total quantity of Latex Traffic Paint produced.

To document compliance with emission limitations as specified in Condition D.1.1, the Permittee shall keep production records and calculate the VOC emissions on a monthly basis using the VOC Compliance Monitoring Form located at the end of this permit, or its equivalent.

Compliance with the VOC limit of 25 tons per year shall be determined on a twelve month rolling total.

##### **D.1.12 Hazardous Air Pollutants (HAPs)**

That the Permittee shall maintain a monthly record of the following:

- a) Total quantity of chrome yellow pigment used.
- b) Throughputs for storage tanks 10, 11, 12, 13, 14, and the underground storage tank's (UST 1's) eight compartments.

To document compliance with emission limitations as specified in Condition D.1.2, the Permittee shall keep production records and calculate the HAPs emissions on a monthly basis using the HAPs Compliance Monitoring Form located at the end of this permit, or its equivalent.

Compliance with the HAP limits of 10 tons per year for any single HAP and 25 tons per year for the combination of HAPs shall be determined on a twelve month rolling total.

##### **D.1.13 Particulate Matter (PM) and Particulate Matter less than 10 microns in diameter (PM10)**

That the Permittee shall maintain a monthly record of the following:

- a) Total quantity of pigments used in the Paint Manufacturing Operation.
- b) Total pigments used in the Water-Based Traffic Paint Manufacturing Operation.
- c) Total quantity of raw material bag dumped in the Paper Coating Manufacturing Operation.

To document compliance with emission limitations as specified in Condition D.1.3, the Permittee shall keep production records and calculate the PM and PM10 emissions on a monthly basis using the PM & PM10 Compliance Monitoring Form located at the end of this permit, or its equivalent.

Compliance with the PM and PM10 limits shall be determined on a twelve month rolling total.

**D.1.14 Record Keeping Requirements - Volatile Organic Liquid Storage Vessels**

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall keep the following records for the life of the vessel:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

**D.1.15 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.7, the Permittee shall maintain records of visible emission notations of each baghouse stack exhaust once per shift.
- (b) To document compliance with Condition D.1.8, the Permittee shall maintain the following:
  - (1) Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
  - (2) Documentation of the dates vents are redirected.
- (c) To document compliance with Condition D.1.4, the Permittee shall maintain records of the dates of bag changes as required under Condition D.1.4.
- (d) To document compliance with Condition D.1.9, the Permittee shall maintain records of the results of the inspections required under Condition D.1.9 and the dates the vents are redirected.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1.16 Reporting Requirements**

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address(es) listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
-AIR POLLUTION CONTROL DIVISION-**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: **Davies Imperial Coatings, Inc.**  
Source Address: 1275 State Street, Hammond, Indiana 46320  
Mailing Address: (same)  
FESOP No.: **F089-13932-00295**

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)
- ☐ Report (specify)
- ☐ Notification (specify)
- ☐ Affidavit (specify)
- ☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
AIR POLLUTION CONTROL DIVISION  
5925 CALUMET AVENUE  
HAMMOND, INDIANA 46320**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: **Davies Imperial Coatings, Inc.**  
Source Address: 1275 State Street, Hammond, Indiana 46320  
Mailing Address: (same)  
FESOP No.: **F089-13932-00295**

**This form consists of 2 pages**

**Page 1 of 2**

<p>___ This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><li>• The Permittee must notify the Office of Air Quality (OAQ) and the Hammond Department of Environmental Management (HDEM), within four (4) business hours (1- 800-451-6027 or 317-233-5674, ask for IDEM Compliance Section) and (219-853-6306, for HDEM); and</li><li>• The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967, IDEM and 219-853-6343, HDEM), and follow the other requirements of 326 IAC 2-7-16.</li></ul>
--

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?      Y      N
Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
AIR POLLUTION CONTROL DIVISION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: **Davies Imperial Coatings, Inc.**  
Source Address: 1275 State Street, Hammond, Indiana 46320  
Mailing Address: (same)  
FESOP No.: **F089-13932-00295**

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".	
<input type="checkbox"/> NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.	
<input type="checkbox"/> THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	
<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT - AIR POLLUTION CONTROL DIVISION -

### FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) PM & PM10 Compliance Monitoring Form

Source Name: **Davies Imperial Coatings, Inc.**  
Source Address: 1275 State Street, Hammond, Indiana 46320  
FESOP No.: **F089-13932-00295**  
PM & PM10 Limit: **47.304 Tons per year, 12 month rolling total**

Reporting Month: \_\_\_\_\_ Year: \_\_\_\_\_

Current Month Emissions			
Parameter	(Tons)	PM emissions (Tons)	PM10 emissions (Tons)
Total pigments used in the Paint Manufacturing Operation			
Total pigments handled in the Water-Based Traffic Paint Manufacturing Operation			
Total raw material bag dumped in the Paper Coating Manufacturing Operation			
<b>Total for the Month</b>			
Previous 11 Months Emissions			
Month 11	N/A		
Month 10	N/A		
Month 9	N/A		
Month 8	N/A		
Month 7	N/A		
Month 6	N/A		
Month 5	N/A		
Month 4	N/A		
Month 3	N/A		
Month 2	N/A		
Month 1	N/A		
Total Previous 12 Months			
Total for the Previous 12 Months (Add Current plus 11 previous months)			

Equations: *(Paint Manufacturing Operation)*

$$\text{PM emissions (Tons)} = \text{Throughput (tons)} \times 20 \text{ lbs/ton} \div 2000$$

$$\text{PM10 emissions (Tons)} = \text{Throughput (tons)} \times 17 \text{ lbs/ton} \div 2000$$

*(Water-Based Traffic Paint Manufacturing Operation)*

$$\text{PM emissions (Tons)} = \text{Throughput (tons)} \times 20 \text{ lbs/ton} \div 2000 \times (1-0.98)$$

$$\text{PM10 emissions (Tons)} = \text{Throughput (tons)} \times 17 \text{ lbs/ton} \div 2000 \times (1-0.98)$$

*(Paper Coating Manufacturing Operation)*

$$\text{PM emissions (Tons)} = \text{Throughput (tons)} \times 0.24 \text{ lbs/ton} \div 2000 \times (1-0.999)$$

$$\text{PM10 emissions (Tons)} = \text{Throughput (tons)} \times 0.12 \text{ lbs/ton} \div 2000 \times (1-0.999)$$

☐ No deviations occurred this month

☐ Deviation(s) occurred this month.

Deviation(s) has been reported on: \_\_\_\_\_

☐ Attached are supporting documentation

Submitted by (Name & Title): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

and

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
- AIR POLLUTION CONTROL DIVISION -**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
VOC Compliance Monitoring Form**

Source Name: **Davies Imperial Coatings, Inc.**  
Source Address: 1275 State Street, Hammond, Indiana 46320  
FESOP No.: **F089-5435-00295**  
Limit: **VOC less than 25 Tons per year, 12 month rolling total**

**Reporting Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

Current Month Emissions		
Parameter	(Tons)	VOC emissions (Tons)
Total quantity of Solvent-Based Paint Produced		
Total quantity of Water-Based Paint Produced		
Total quantity of Latex Traffic Paint Produced		
<b>Total for the Month</b>		
Previous 11 Months Emissions		
Month 11	N/A	
Month 10	N/A	
Month 9	N/A	
Month 8	N/A	
Month 7	N/A	
Month 6	N/A	
Month 5	N/A	
Month 4	N/A	
Month 3	N/A	
Month 2	N/A	
Month 1	N/A	
Total Previous 12 Months		
Total for the Previous 12 Months (Add Current plus 11 previous months)		

Equations: *(Solvent-Based Paints)*

$$\text{VOC emissions (Tons)} = \text{Throughput (tons)} \times 24 \text{ lbs/ton} \div 2000$$

*(Water-Based Paints)*

$$\text{VOC emissions (Tons)} = \text{Throughput (tons)} \times 3.6 \text{ lbs/ton} \div 2000$$

*(Latex Traffic Paint)*

$$\text{VOC emissions (Tons)} = \text{Throughput (tons)} \times 2.88 \text{ lbs/ton} \div 2000$$



**Miscellaneous Information:**

**Total Natural Gas usage:** \_\_\_\_\_ **cuft**

\_\_\_ **No deviations occurred this month**

\_\_\_ **Deviation(s) occurred this month.**

**Deviation(s) has been reported on:** \_\_\_\_\_

\_\_\_ **Attached are supporting documentation**

**Submitted by (Name & Title):** \_\_\_\_\_

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
– AIR POLLUTION CONTROL DIVISION –**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
HAPs Compliance Monitoring Form**

Source Name: **Davies Imperial Coatings, Inc.**  
Source Address: **1275 State Street, Hammond, Indiana 46320**  
FESOP No.: **F089-13932-00295**  
Limit: **Less than 10 tons per year single HAP; less than 25 tons per year combined HAPs; 12 month rolling total**

**Reporting Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

Current Month Emissions			
Parameter	(Tons)	HAP Emissions (Tons)	
		Lead Emissions (Tons)	Chrome Emissions (Tons)
<i>Paint Manufacturing</i>			
Total quantity of Chrome Yellow Pigment Used, tanks 6 - 9 (Lead & Chrome)			
<i>Storage Tanks</i>		HAP Emissions (Tons)	
Throughput for tanks 10 & 11 (Toluene)			
Throughput for tanks 12 - 14 (Xylene)			
Throughput for UST, Compartment 1 (Toluene)			
Throughput for UST, Compartment 2 (Xylene)			
Throughput for UST, Compartment 3 (MEK)			
Throughput for UST, Compartment 4 (Naphtha)		0	
Throughput for UST, Compartment 5 (Methanol)			
Throughput for UST, Compartment 6 (Methanol)			
Throughput for UST, Compartment 7 (Mineral Spirits)		0	
Throughput for UST, Compartment 8 (Heptane)			
<b>Total for the Month</b>			
Previous 11 Months Emissions			
Month 11	N/A		
Month 10	N/A		
Month 9	N/A		
Month 8	N/A		
Month 7	N/A		
Month 6	N/A		
Month 5	N/A		
Month 4	N/A		
Month 3	N/A		
Month 2	N/A		
Month 1	N/A		
Total Previous 12 Months			
Total for the Previous 12 Months (Add Current plus 11 previous months)			

**Equations:** *(Chrome Yellow)*

**Lead emissions (Tons) = Throughput (tons) x 20 lbs/ton x 0.064 x 0.6 ÷ 2000**

**Chrome emission (Tons) = Throughput (tons) x 20 lbs/ton x 0.064 x 0.14 ÷ 2000**

*(Storage Tanks)*

**HAP emissions (Tons) = Throughput (tons) x 40 lbs/ton ÷ 2000**

☐ No deviation occurred this month

☐ Deviation(s) occurred this month.

Deviation(s) has been reported on: \_\_\_\_\_

☐ Attached are supporting documentation

Submitted by (Name & Title): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
- AIR POLLUTION CONTROL DIVISION -**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
Pressure Drop Monitoring Form**

Source Name: **Davies Imperial Coatings, Inc.**  
Source Address: 1275 State Street, Hammond, Indiana 46320  
FESOP No.: **F089-13932-00295**

**Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_

	<i>Paper Coating Manufacturing Operation</i>					<i>Latex Traffic Paint</i>
	Unit 1	Unit 2	Unit 3	Unit 4	Unit 5	Unit 1
	<b>ΔP Reading (inches of water)</b>					
Day 1						
Day 2						
Day 3						
Day 4						
Day 5						
Day 6						
Day 7						
Day 8						
Day 9						
Day 10						
Day 11						
Day 12						
Day 13						
Day 14						
Day 15						
Day 16						
Day 17						
Day 18						
Day 19						
Day 20						
Day 21						
Day 22						
Day 23						
Day 24						
Day 25						
Day 26						
Day 27						
Day 28						
Day 29						
Day 30						
Day 31						

☐ No deviations occurred this month

☐ Deviation(s) occurred this month.

Deviation(s) has been reported on: \_\_\_\_\_

☐ Attached are supporting documentation

Submitted by (Name & Title): \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

# **HAMMOND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT – AIR POLLUTION CONTROL DIVISION –**

## **FESOP-Visual Stack Notations Form**

Source Name: **Davies Imperial Coatings, Inc.**  
Source Address: 1275 State Street, Hammond, Indiana 46320  
FESOP No.: **F089-13932-00295**

**Month:** \_\_\_\_\_ **Year:** \_\_\_\_\_ **Shift:** \_\_\_\_\_

	<i>Paper Coating Manufacturing Operation</i>					<i>Latex Traffic Paint</i>
	Unit 1	Unit 2	Unit 3	Unit 4	Unit 5	Unit 1
	<b>Stack Notation (Normal or Above Normal)</b>					
Day 1						
Day 2						
Day 3						
Day 4						
Day 5						
Day 6						
Day 7						
Day 8						
Day 9						
Day 10						
Day 11						
Day 12						
Day 13						
Day 14						
Day 15						
Day 16						
Day 17						
Day 18						
Day 19						
Day 20						
Day 21						
Day 22						
Day 23						
Day 24						
Day 25						
Day 26						
Day 27						
Day 28						
Day 29						
Day 30						
Day 31						

**Indiana Department of Environmental Management  
Office of Air Quality**

and

**Hammond Department of Environmental Management**

Addendum to the  
Technical Support Document for Federally Enforceable State Operating Permit  
(FESOP) Renewal

**Davies Imperial Coatings, Inc.  
1275 State Street  
Hammond, Indiana 46320**

**F089-13932, Plt ID-089-00295**

On March 16, 2002, the Hammond Department of Environmental Management (HDEM) had a notice published in the Times, Hammond, Indiana, stating that Davies Imperial Coatings, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate a Paint and Paper Coating Manufacturing Plant. The notice also stated that HDEM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

No comments were received during the public notice period.

On April 23, 2002, HDEM made the following corrections/changes to the proposed FESOP Renewal (~~strikeout~~ added to show what was deleted and **bold** added to show what was added):

1. On pages 4 and 5 of 46 of the FESOP, under Condition A.2 Emission Units and Pollution Control Equipment Summary, equipment ID numbers within tables under EU-01: Paint Manufacturing Operation, EU-02: Water-Based Traffic Paint Manufacturing Operation, and EU-03: Paper Coating Manufacturing Operation have been changed per the company's request. Changes made are as follows:

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

**EU-01: Paint Manufacturing Operation**

This operation includes the manufacturing of water-based & solvent-based industrial paints and water-based & solvent-based traffic paints. This operation includes the following specific production equipment:

Equipment	Equipment ID No.
<i>Traffic Paint Production</i>	
(4) 600 gallon tanks	<del>6, 7, 8, &amp; 9</del> <b>L1, L2, L3, &amp; L4</b>
(2) 1700 gallon tanks	10 & 11
(1) 2,000 gallon tank	12
(1) 1,400 gallon tank	13
(1) 2,700 gallon tank	14
(1) 300 gallon mixer	<del>45</del> <b>G1</b>
<i>Industrial Paint Production</i>	
(1) 210 gallon mixer	G2
(1) 330 gallon mixer	G3
(1) 140 gallon mixer	G5
(2) 540 gallon tanks with one common mixing arm	G7a & G7b

The maximum design rate of pigments added is 0.75 ton per hour. The maximum production of solvent-based and water-based paints is 1 ton per hour of each type of paint.

There is no air pollution control equipment associated with this operation.

#### **EU-02: Water-Based Traffic Paint Manufacturing Operation**

This operation consists of the following process units:

Equipment	Equipment ID No.
(2) 2,000 gallon mixers with one common mixing arm	<del>3 &amp; 4</del> <b>G8a &amp; G8b</b>
(2) 7,000 gallon raw material tanks	1 & 2
(1) 2,500 gallon tank	5
(1) bulk handling system ( <b>silos</b> )	
(1) bag dump station w/ filter	<b>D6</b>

The maximum design rate of pigments handled is 1 ton per hour. The maximum design rate of water-based traffic paint produced is 3.5 tons per hour.

Particulate emissions from the bag dump operation are controlled by a bag filter unit.



### EU-03: Paper Coating Manufacturing Operation

This operation consists of the following process units:

Equipment	Equipment ID No.
(5) 660 gallon mixers	M1, M2, M3, M4, & M5
(5) bag dump stations w/ filters	D1, D2, D3, D4, & D5
(3) 1500 gallon finished product holding tanks	1E, 3E, & 1W
(6) 2700 gallon finished product storage tanks	2E, 4E, 6E, 7E, 2W, & 3W
(1) 2500 gallon blend tank (Rigid Disk Manufacturing Operation)	4W RD

The maximum design rate of raw material bag dumping is 2.5 tons per hour. Emissions from each bag dump station are controlled by a bag filter unit.

- On pages 27 and 28 of 46 of the FESOP, equipment ID numbers within tables in the Description Box for EU-01: Paint Manufacturing Operation, EU-02: Water-Based Traffic Paint Manufacturing Operation, and EU-03: Paper Coating Manufacturing Operation have been changed per the company's request. Changes made are as follows:

## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]: Paint & Paper Coating Manufacturing Operations

#### EU-01: Paint Manufacturing Operation

This operation includes the manufacturing of water-based & solvent-based industrial paints and water-based & solvent-based traffic paints. This operation includes the following specific production equipment:

Equipment	Equipment ID No.
<i>Traffic Paint Production</i>	
(4) 600 gallon tanks	<del>6, 7, 8, &amp; 9</del> L1, L2, L3, & L4
(2) 1700 gallon tanks	10 & 11
(1) 2,000 gallon tank	12
(1) 1,400 gallon tank	13
(1) 2,700 gallon tank	14
(1) 300 gallon mixer	<del>45</del> G1
<i>Industrial Paint Production</i>	
(1) 210 gallon mixer	G2
(1) 330 gallon mixer	G3
(1) 140 gallon mixer	G5
(2) 540 gallon tanks with one common mixing arm	G7a & G7b

The maximum design rate of pigments added is 0.75 ton per hour. The maximum production of solvent-based and water-based paints is 1 ton per hour of each type of paint.

There is no air pollution control equipment associated with this operation.

#### **EU-02: Water-Based Traffic Paint Manufacturing Operation**

This operation consists of the following process units:

Equipment	Equipment ID No.
(2) 2,000 gallon mixers with one common mixing arm	<del>3 &amp; 4</del> <b>G8a &amp; G8b</b>
(2) 7,000 gallon raw material tanks	1 & 2
(1) 2,500 gallon tank	5
(1) bulk handling system ( <b>silos</b> )	
(1) bag dump station w/ filter	<b>D6</b>

The maximum design rate of pigments handled is 1 ton per hour. The maximum design rate of water-based traffic paint produced is 3.5 tons per hour.

Particulate emissions from the bag dump operation are controlled by a bag filter unit.

#### **EU-03: Paper Coating Manufacturing Operation**

This operation consists of the following process units:

Equipment	Equipment ID No.
(5) 660 gallon mixers	M1, M2, M3, M4, & M5
(5) bag dump stations w/ filters	D1, D2, D3, D4, & D5
(3) 1500 gallon finished product holding tanks	1E, 3E, & 1W
(6) 2700 gallon finished product storage tanks	2E, 4E, 6E, 7E, 2W, & 3W
(1) 2500 gallon blend tank (Rigid Disk Manufacturing Operation)	4W RD

The maximum design rate of raw material bag dumping is 2.5 tons per hour. Emissions from each bag dump station are controlled by a bag filter unit.

3. On page 28 of 46 of the FESOP, under Condition D.1.2 Hazardous Air Pollutants (HAPs) section (b), the underground storage tank was assigned the identification number (UST 1) as follows:

D.1.2 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1] [326 IAC 2-7]

Hazardous Air Pollutants (HAPs) shall be kept below the following:

- (a) Total input of any one (1) single hazardous air pollutant (HAP) for all operations at this facility shall be kept below ten (10) tons per 12 consecutive month period.
- (b) Total input of any combination of HAPs for all operations at this facility shall be kept below twenty-five (25) tons per 12 consecutive month period. Note that HAPs emission estimates are based on a 2% loss of throughput through Above Ground Storage Tanks 6-9 and the Underground Storage Tank (**UST 1**).

4. On page 29 of 46 of the FESOP, under Condition D.1.7 Visible Emissions Notations section (b), the word "time" was mistakenly left out and has now been inserted as follows:

D.1.7 Visible Emissions Notations

- (a) Visible emission notations of each baghouse stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the **time** the process is in operation, not counting startup or shut down time.

5. On page 30 of 46 of the FESOP, under Condition D.1.8 Parametric Monitoring, in the first sentence of the last paragraph where it reads...The instrument used for determining the pressure shall comply with... the word "drop" has been inserted between the words pressure and shall.

The instrument used for determining the pressure **drop** shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ and HDEM and shall be calibrated at least once every six (6) months.

6. On page 31 of 46 of the FESOP, under Condition D.1.12 Hazardous Air Pollutants (HAPs) the underground storage tank's identification number (UST 1) has been added as follows:

D.1.12 Hazardous Air Pollutants (HAPs)

That the Permittee shall maintain a monthly record of the following:

- a) Total quantity of chrome yellow pigment used.
- b) Throughputs for storage tanks 10, 11, 12, 13, 14, and the underground storage tank's (**UST 1's**) eight compartments.

7. On page 34 of 46 of the FESOP, the Emergency Occurrence Report form has been modified to include the Hammond Department of Environmental Management's telephone and facsimile numbers as follows:

**This form consists of 2 pages**

**Page 1 of 2**

- This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ) **and the Hammond Department of Environmental Management (HDEM)**, within four **(4)** business hours (1- 800-451-6027 or 317-233-5674, ask for IDEM Compliance Section) **and (219-853-6306, for HDEM)**; and
  - The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967, **IDEM and 219-853-6343, HDEM**), and follow the other requirements of 326 IAC 2-7-16.

**Appendix A: Source Emissions Calculations** has also been modified to show the revised equipment ID numbers.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Hammond Department of Environmental Management  
- Air Pollution Control Division-**

**Technical Support Document (TSD) for a Federally Enforceable Operating  
Permit (FESOP) Renewal**

**Source Background and Description**

**Source Name:** Davies Imperial Coatings, Inc.  
**Source Location:** 1275 State Street, Hammond, Indiana 46320  
**County:** Lake  
**SIC Code:** 2851 – Paints & Allied Products and 2672 – Paper Coated & Laminated  
**Operation Permit No.:** F089-13932-00295  
**Permit Reviewer:** Debra Malone, HDEM

The Hammond Department of Environmental Management (HDEM) has reviewed a FESOP renewal application from Davies Imperial Coatings, Inc. relating to the operation of a Paint and Paper Coating Manufacturing Plant. Davies Imperial Coatings, Inc. was issued FESOP 089-5435-00295 on December 9, 1996.

**Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

**EU-01: Paint Manufacturing Operation**

This operation includes the manufacturing of water-based & solvent-based industrial paints and water-based & solvent-based traffic paints. This operation includes the following specific production equipment:

Equipment	Equipment ID No.
<i>Traffic Paint Production</i>	
(4) 600 gallon tanks	6, 7, 8, & 9
(2) 1700 gallon tanks	10 & 11
(1) 2,000 gallon tank	12
(1) 1,400 gallon tank	13
(1) 2,700 gallon tank	14
(1) 300 gallon mixer	15
<i>Industrial Paint Production</i>	
(1) 210 gallon mixer	G2
(1) 330 gallon mixer	G3
(1) 140 gallon mixer	G5
(2) 540 gallon tanks with one common mixing arm	G7a & G7b

The maximum design rate of pigments added is 0.75 ton per hour. The maximum production of solvent-based and water-based paints is 1 ton per hour of each type of paint.

There is no air pollution control equipment associated with this operation.

#### **EU-02: Water-Based Traffic Paint Manufacturing Operation**

This operation consists of the following process units:

Equipment	Equipment ID No.
(2) 2,000 gallon mixers with one common mixing arm	3 & 4
(2) 7,000 gallon raw material tanks	1 & 2
(1) 2,500 gallon tank	5
(1) bulk handling system	
(1) bag dump station w/ filter	

The maximum design rate of pigments handled is 1 ton per hour. The maximum design rate of water-based traffic paint produced is 3.5 tons per hour.

Particulate emissions from the bag dump operation are controlled by a bag filter unit.

#### **EU-03: Paper Coating Manufacturing Operation**

This operation consists of the following process units:

Equipment	Equipment ID No.
(5) 660 gallon mixers	M1, M2, M3, M4, & M5
(5) bag dump stations w/ filters	D1, D2, D3, D4, & D5
(3) 1500 gallon finished product holding tanks	1E, 3E, & 1W
(6) 2700 gallon finished product storage tanks	2E, 4E, 6E, 7E, 2W, & 3W
(1) 2500 gallon blend tank (Rigid Disk Manufacturing Operation)	4W RD

The maximum design rate of raw material bag dumping is 2.5 tons per hour. Emissions from each bag dump station are controlled by a bag filter unit.

## **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

## **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- 1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- 2) Paved and unpaved roads and parking lots with public access.
- 3) Grinding and machining operations with fabric filters, scrubbers, mist collectors, wet collectors, and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.

## **Existing Approvals**

- (a) FESOP 089-5435-00295, issued on December 9, 1996; and expiring on December 9, 2001
- (b) AAF089-8725-00295, issued August 4, 1997.
- (c) AAF089-9215-00295, issued January 16, 1998, and
- (d) AAF089-11842-00295, issued February 25, 2000.

All conditions from previous approvals were incorporated into this FESOP.

## **Enforcement Issue**

There are no enforcement actions pending.

## **Recommendation**

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on February 8, 2001.

There was no notice of completeness letter mailed to the source.

## **Emission Calculations**

See Appendix A of this document for detailed emissions calculations (pages 1 through 9).

## Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	107.3151
PM-10	90.3198
SO <sub>2</sub>	0.0106
VOC	75.3029
CO	0.3712
NO <sub>x</sub>	1.7678

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Lead	0.0415
Chromium	0.0097
Toluene	8.357
Xylene	6.140
MEK	1.795
Glycol Ethers	0.528
Ethylene Glycol	0.517
Heptane	2.239
TOTAL HAPS	19.6272

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

## Potential to Emit After Issuance

The source, issued a FESOP on December 9, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP. (F089-5435-00295; issued on December 9, 1996).

	Potential to Emit After Issuance (tons/year)						
Process/emission unit	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Total PTE After Issuance	47.304	47.304	Negligible	25	Negligible	Negligible	*19.627

PM emissions are limited in accordance with 326 IAC 6-3-2. PM10 emissions were set equal to the PM.



VOC emissions are limited to less than 25 tons per year.

SO<sub>2</sub>, NO<sub>x</sub>, and CO emissions are negligible.

\*The HAPs emissions shall be kept below 10 tons per year of any individual HAP and below 25 tons per year of the combination of HAPs in order for the source to remain not applicable to the requirements of Major Sources of Hazardous Air Pollutants (326 IAC 2-4.1-1) and the Part 70 Operating Permit Program (326 IAC 2-7).

### County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	Moderate Nonattainment
SO <sub>2</sub>	Primary Nonattainment
NO <sub>2</sub>	Unclassifiable/Attainment
Ozone	Severe Nonattainment
CO	Unclassifiable/Attainment
Lead	Attainment

40 CFR Part 81.315 Indiana

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

### Federal Rule Applicability

- (a) The storage tanks are not subject to 40 CFR Part 60, Subpart K, Standards of Performance for Storage Vessels for Petroleum Liquids for which construction, reconstruction, or modification commenced after June 11, 1973, and prior to May 19, 1978, because they each have a design capacity of less than 40,000 gallons.
- (b) The storage tanks are not subject to 40 CFR Part 60, Subpart Ka, Standards of Performance for Storage Vessels for Petroleum Liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and Prior to July 23, 1984, because they each have a design capacity of less than 40,000 gallons.
- (c) The storage tanks are not subject to 40 CFR Part 60, Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels for which construction, reconstruction, or modification commenced after July 23, 1984, because they each have a design capacity of less than 40 m<sup>3</sup> (10,500 gallons).
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

### State Rule Applicability - Entire Source

#### 326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on March 18, 1997. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

**326 IAC 2-3 (Emission Offset)**

This source predates the 326 IAC 2-3 (Emission Offset) rule. The source has not been reviewed under the requirements of 326 IAC 2-3 because there has not been a major modification, as defined in these rules, subject to the requirements of 326 IAC 2-3.

**326 IAC 2-4.1-1 (New source toxics control)**

This source is not subject to 2-4.1-1 (New source toxics control), because this major source of hazardous air pollutants was not constructed or reconstructed after July 27, 1997.

**326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Lake County and has the potential to emit more than ten (10) tons per year of volatile organic compounds (VOC). Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The annual statement must be received by April 15<sup>th</sup> of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

The source is in compliance with the required emission statement submittals.

**326 IAC 5-1 (Visible Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of twenty percent (20%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

No violations of the opacity standards have been observed at this source.

**State Rule Applicability - Individual Facilities**

**326 IAC 6-1-1 (Nonattainment Area Limitations – Applicability)**

Pursuant to 326 IAC 6-1-1 (Nonattainment Area Limitations – Applicability), sources or facilities that are: (1) located in the counties listed in section 7 of this rule; (2) but which sources or facilities are not specifically listed in section 7 of this rule; and (3) have the potential to emit one hundred (100) tons or more of particulate matter per year or have actual emissions of ten (10) tons or more of particulate matter per year; shall comply with limitations of applicable sections that follow.

This source is applicable to this rule because it is located in Lake County and has the potential to emit one hundred (100) tons or more of particulate matter per year.

**326 IAC 6-3-2 (Process Operations)**

Pursuant to F089-5435-00295, issued on December 9, 1996, the particulate matter (PM) from the Paint Manufacturing Operation, Water-Based Traffic Paint Manufacturing Operation and the Paper Coating Manufacturing Operation shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

$$P = (0.75 + 1 + 2.5) = 4.25 \text{ Tons per hour (total for all particulate facilities combined)}$$

$$E = 4.10 \times (P^{0.67})$$

$$E = 4.10 \times (4.25^{0.67}) = 10.8 \text{ pounds per hour}$$

The particulate control devices shall be in operation at all times when the particulate facilities are in operation, in order to comply with this limit.

**326 IAC 6-3-2(c) (Particulate Emission Limitations for Process Operations)**

Pursuant to this rule, Particulate Matter emissions from the Paint Manufacturing Operation, Water-Based Traffic Paint Manufacturing Operation and the Paper Coating Manufacturing Operation shall not exceed 10.8 lbs/hr based on the Maximum Process Weight of 4.25 tons per hour.

**326 IAC 8-1-6 (New facilities; general reduction requirements)**

No facility at this source is applicable to this rule because VOC emissions shall be limited to less than 25 tons per year.

Total input of volatile organic compounds (VOC) for all operations at this facility, including coatings, dilution solvents, and cleaning solvent, shall be limited to less than twenty-five (25) tons per 12 consecutive month period; therefore, the requirements of New Facilities; General Reduction Requirements (326 IAC 8-1-6) do not apply.

**326 IAC 8-2-5 (Paper coating operation)**

This source is not applicable to this rule because the source only manufactures the paper coating and does not perform the coating of paper.

**326 IAC 8-9 (Volatile Organic Liquid Storage Vessels – Applicability)**

The storage tanks are only subject to the record keeping requirements of 326 IAC 8-9-6(a) and (b) because each has a capacity of less than thirty-nine thousand (39,000) gallons. Pursuant to 326 IAC 8-9-6, the Permittee shall keep the following records for the life of the vessel:

- a) The vessel identification number.
- b) The vessel dimensions.
- c) The vessel capacity.

**Testing Requirements**

The Permittee is not required to test this facility by this permit. However, HDEM or IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by HDEM or IDEM, compliance with the limits specified in the permit shall be determined by a performance test conducted in accordance with Section C – Performance Testing.

## Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP. The compliance monitoring requirements applicable to this source are as follows:

1. The Water-Based Traffic Paint and Paper Coating Manufacturing Operations have applicable compliance monitoring conditions as specified below:
  - a) The total static pressure drop across the control equipment must be measured and recorded daily. The pressure drop for the units shall be maintained within the following ranges in inches of water.

Unit ID	P range (inches of water)
<i>Water-Based Traffic Paint Manufacturing Operation</i>	
Baghouse 1	2 - 4
<i>Paper Coating Manufacturing Operation</i>	
Baghouse 2	4 - 6
Baghouse 3	4 - 6
Baghouse 4	2 - 4
Baghouse 5	2 - 4

If the pressure drop is outside this range for more than two consecutive readings, corrective action shall be taken in accordance with the Preventive Maintenance Plan.

- b) The bags in Baghouse 1 of the Paper Coating Manufacturing Operation shall be replaced every 2 months. Dates of bag changes shall be logged and maintained for inspection by HDEM and IDEM.
    - c) Visual stack emission notations are required once per shift for the above six (6) bag dump stations.

- d) Monthly records of the following process parameters shall be maintained and submitted on the forms attached to demonstrate compliance with the applicable emission limitations:
  - 1) Total quantity of solvent-based paint produced.
  - 2) Total quantity of water-based paint produced.
  - 3) Total quantity of Latex Traffic Paint produced.
  - 4) Total quantity of chrome yellow pigment used.
  - 5) Throughputs for storage tanks 10, 11, 12, 13, 14, and the underground storage tank's eight compartments.
  - 6) Total quantity of pigments used in the Paint Manufacturing Operation.
  - 7) Total pigments used in the Water-Based Traffic Paint Manufacturing Operation.
  - 8) Total quantity of raw material bag dumped in the Paper Coating Manufacturing Operation.
- e) Quarterly reports shall be submitted to HDEM and OAQ, Compliance Section. These reports shall include the pressure drop readings, cleaning cycle: frequency and pressure drop, visual stack emission notations, and process parameters.

These monitoring conditions are necessary to ensure compliance with the requirements of 326 IAC 2-8 (FESOP).

## Conclusion

The operation of this **Paint and Paper Coating Manufacturing Plant** shall be subject to the conditions of the attached proposed **(FESOP No.: F089-13932-00295)**.

Plant ID: 00295

Company Name: Davies Imperial Coatings, Inc.

Address: 1275 State Street, Hammond, Indiana 46320

Calculations By: Lito Biscocho

Modified By: Debra Malone (4/23/02)

NO. OF POINTS: 3NO. OF SEGMENTS: 8Date of Calc: 6/7/01Year of Data: 2000**\*\*NOTES\*\***

EF: EMISSION FACTOR

MDR: MAXIMUM DESIGN RATE

Ts: STACK DISCHARGE TEMPERATURE

CE: CONTROL EFFICIENCY

MDC: MAXIMUM DESIGN CAPACITY

UNITS FOR EMISSIONS ARE IN (TPY) EXCEPT WHERE GIVEN

\*\*\*\*\*  
EU-01: Paint Manufacturing Operation  
\*\*\*\*\*

This operation includes the production of solvent-based and water-based industrial paints, and solvent-based and water-based traffic paints.

Includes: *(Used for solvent-based& water-based traffic paint)*

(4) 600 gal tanks: IDs L1, L2, L3, &amp; L4

(2) 1700 gal tanks: IDs 10 &amp; 11

(1) 2,000 gal tank: ID 12

(1) 1,400 gal tank: ID 13

(1) 2,700 gal tank: ID 14

(1) 300 gal Mixer: ID G1

*(Used for solvent-based & water-based industrial paints)*

(1) 140 gal mixer: ID G5

(1) 210 gal mixer: ID G2

(1) 330 gal mixer: ID G3

(2) 540 gal mix tanks with one common mixing arm: ID G7a &amp; G7b

## (Pigments Handling)

MDR (chrome yellow) (T/hr): 0.048

MDR (T/hr): 0.75

STACK ID (DIAM:HEIGHT): (No Stack)

YEARLY USAGE, CHROME YELLOW (T/yr): 38.53

PIGMENT USED (T/yr): 602.00

FLOWRATE (ACFM): N/A

CNTRL DEV: No mechanical device is used,

Ts(°F): N/A

however, low dust chrome yellow pigment is used.

SCC # 3-01-014-02			POTENTIAL TO EMIT (PTE)						ACTUAL EMISSIONS	
			BEFORE CONTROLS			AFTER CONTROLS			BEFORE	AFTER
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	CONTROLS	CONTROLS
POLLUTANT	EF(LB/T)	CE (%)								
PM	20	0	15.0000	360.0000	16.8750	15.0000	16.8750	#VALUE!	6.0200	6.0200
PM10	17	0	12.7500	306.0000	14.3438	12.7500	14.3438	#VALUE!	5.1170	5.1170
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
HAPs (LEAD)	0.768	0.75	0.0369	0.8847	0.0415	0.0092	0.0104	N/A	0.0148	0.0037
HAPs (CHROMIUM)	0.179	0.75	0.0086	0.2064	0.0097	0.0022	0.0024	N/A	0.0035	0.0009

\*6.4% of total pigment is Chrome Yellow Y-969-LD; 60 wt% of Chrome Yellow is lead; 14 wt % is chromium; 75% dust reduction (LD) due to electrostatic charge (see review).

\*EF for Lead HAP is, therefore,  $20 \times 0.064 \times 0.6 = 0.768$  lb/ton of pigment handled.

\*EF for Chromium HAP is, therefore,  $20 \times 0.064 \times 0.14 = 0.179$  lb/ton of pigment handled.

Recordkeeping: Monthly pigment usage & lead-chromate pigment usage.

Reporting: Quarterly report.

## (Solvent-based Paints) - General Mixing &amp; Handling

MDR (T produced/hr): 1  
YEARLY PROD (T/yr): 755.41STACK ID (DIAM:HEIGHT): (No Stack)  
FLOWRATE (ACFM): N/A  
Ts(°F): N/A

CNTRL DEV: None

(AP-42, Section 6.4, Table 6.4-1) SCC # 3-01-014-01			PERMITTED OPERATING HRS:		2250		hr/yr				ACTUAL EMISSIONS	
			POTENTIAL TO EMIT (PTE)								BEFORE CONTROLS	AFTER CONTROLS
POLLUTANT	EF (LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!			0.0000	
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!			0.0000	
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	
VOC	24	0	24.0000	576.0000	27.0000	24.0000	27.0000	N/A			9.0649	
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	

EF for conventional paints is 30 lbs VOC per ton of paint produced. This is based on a solvent by weight content of 50%.

The average solvent by weight content of Davies' solvent-based paint is 40%.

Thus, EF for solvent-based paints for Davies is, therefore, 30x(40/50) = 24 lb/ton of paint produced.

HAPs Emissions: See page 7 of 9.

Recordkeeping: Monthly production of each type of product.

Reporting: Quarterly report.

## (Water-Based Paints) - General Mixing &amp; Handling

MDR (T produced/hr): 1  
YEARLY PROD (T/yr): 415.49STACK ID (DIAM:HEIGHT): (No Stack)  
FLOWRATE (ACFM): N/A  
Ts(°F): N/A

CNTRL DEV: None

(AP-42, Section 6.4, Table 6.4-1)			PERMITTED OPERATING HRS:		2250		hr/yr				ACTUAL EMISSIONS	
			POTENTIAL TO EMIT (PTE)								BEFORE CONTROLS	AFTER CONTROLS
SCC # 3-01-014-01			BEFORE CONTROLS			AFTER CONTROLS					BEFORE CONTROLS	AFTER CONTROLS
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!		0.0000		
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!		0.0000		
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		0.0000		
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		0.0000		
VOC	3.6	0	3.6000	86.4000	4.0500	3.6000	4.0500	N/A		0.7479		
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		0.0000		
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A		0.0000		

EF for conventional paints is 30 lbs VOC per ton of paint produced. This is based on a solvent by weight content of 50%.

The average solvent by weight content of Davies' water-based paint is 6%.

Thus, EF for water-based paints for Davies is, therefore, 30x(6/50) = 3.6 lb/ton of paint produced.

Recordkeeping: Monthly production of each type of product.

Reporting: Quarterly report.



## Total: Paint Manufacturing Operation (Solvent &amp; Water-Based)

POLLUTANT	POTENTIAL TO EMIT (PTE)						ACTUAL EMISSIONS	
	BEFORE CONTROLS			AFTER CONTROLS			BEFORE CONTROLS	AFTER CONTROLS
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	15.0000	360.0000	16.8750	15.0000	16.8750	#VALUE!	6.0200	6.0200
PM10	12.7500	306.0000	14.3438	12.7500	14.3438	#VALUE!	5.1170	5.1170
SOx	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	0.0000	0.0000
NOx	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	0.0000	0.0000
VOC	27.6000	662.4000	31.0500	27.6000	31.0500	#VALUE!	9.8128	9.8128
CO	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	0.0000	0.0000
HAPs	0.0455	1.0912	0.0511	0.0114	0.0128	#VALUE!	0.0182	0.0046

## EU-02: Latex Traffic Paint Manufacturing

Includes: (2) 7000 gal tanks: ID 1, & 2  
 (2) 2000 gal tanks: ID G8a & G8b  
 (1) bulk handling system (silo) for CaCO<sub>3</sub>  
 (1) Bag Dump station for TiO<sub>2</sub> & CaCO<sub>3</sub>: ID D6 (Stack ID 1)

(Pigments Handling)

MDR (T produced/hr): 1  
 YEARLY PROD (T/yr): 568.00

STACK ID (DIAM:HEIGHT):

FLOWRATE (ACFM):

Ts(°F):

CNTRL DEV: Self Contained Bag Filter

PERMITTED OPERATING HRS: 8760 hr/yr

SCC # 3-01-014-02			POTENTIAL TO EMIT (PTE)						ACTUAL EMISSIONS	
POLLUTANT	EF(LB/T)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS			BEFORE CONTROLS	AFTER CONTROLS
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)		
PM	20	0.98	20.0000	480.0000	87.6000	0.4000	1.7520	#DIV/O!	5.6800	0.1136
PM10	17	0.98	17.0000	408.0000	74.4600	0.3400	1.4892	#DIV/O!	4.8280	0.0966
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000

Recordkeeping: Monthly pigment usage.

Reporting: Quarterly report.

(Water-Based Traffic Paint) - GENERAL MIXING &amp; HANDLING

MDR (T produced/hr): 3.5

STACK ID (DIAM:HEIGHT): (No Stack)

YEARLY PROD (T/yr): 1,084.00

FLOWRATE (ACFM): N/A

CNTRL DEV: None

Ts(°F): N/A

(AP-42, Section 6.4, Table 6.4-1) SCC # 3-01-014-01			PERMITTED OPERATING HRS:		8760		hr/yr							ACTUAL EMISSIONS	
			POTENTIAL TO EMIT (PTE)											BEFORE	AFTER
			BEFORE CONTROLS			AFTER CONTROLS								CONTROLS	CONTROLS
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)							
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!			0.0000	0.0000			
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!			0.0000	0.0000			
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	0.0000			
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	0.0000			
VOC	2.88	0	10.0800	241.9200	44.1504	10.0800	44.1504	N/A			1.5610	1.5610			
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	0.0000			
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	0.0000			

EF for conventional paints is 30 lbs VOC per ton of paint produced. This is based on a solvent by weight content of 50%.

The average solvent by weight content of Davies' water-based traffic paint is 4.8%.

Thus, EF for water-based traffic paints for Davies is, therefore, 30x(4.8/50) = 2.88 lb/ton of paint produced.

Recordkeeping: Monthly production of product.

Reporting: Quarterly report.

Total: Latex Traffic Paint Manufacturing Operation									
POTENTIAL TO EMIT (PTE)									
BEFORE CONTROLS				AFTER CONTROLS					
POLLUTANT	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)			
PM	20.0000	480.0000	87.6000	0.4000	1.7520	#DIV/O!	5.6800	0.1136	
PM10	17.0000	408.0000	74.4600	0.3400	1.4892	#DIV/O!	4.8280	0.0966	
SOx	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	0.0000	0.0000	
NOx	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	0.0000	0.0000	
VOC	10.0800	241.9200	44.1504	10.0800	44.1504	#VALUE!	1.5610	1.5610	
CO	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	0.0000	0.0000	
HAPs	0.0000	0.0000	0.0000	0.0000	0.0000	#VALUE!	0.0000	0.0000	

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EU-03: Paper Coating Manufacturing

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2/4/00: AAF089-11842-00295 - Changes:

1. Addition of Mixer #5

2. Addition of a 2500-gallon tank for the Rigid Disk Manufacturing Operation

3. Update tank numbers for consistency with Company designations.

These changes did not affect the Potential to Emit for this process.

Includes:

(5) 660-gal mixers: ID M1, M2, M3, M4, M5

(6) 2700-gal finished product storage tanks: ID 2E, 4E, 6E, 7E, 2W, & 3W

(3) 1500-gal finished product holding tanks: ID 1E, 3E, & 1W

(1) 2500-gal blend tank for Rigid Disk Manufacturing Operation: 4W RD

(5) Bag Dump stations w/ bag filters for amorphous silicon dioxide, fumed silica & fumed alumina: ID D1, D2, D3, D4, & D5

MDR (T produced/hr): 2.5

STACK ID (DIAM:HEIGHT):

YEARLY PROD (T/yr): \*Per 326 IAC 2-7-1(21)(J),

FLOWRATE (ACFM):

source not required to submit emission

information for this facility (Insignificant Activity).

CNTRL DEV: Self Contained Bag Filter

SCC # 3-01-014-01			PERMITTED OPERATING HRS:		8760		hr/yr							ACTUAL EMISSIONS	
			POTENTIAL TO EMIT (PTE)											BEFORE CONTROLS	AFTER CONTROLS
			BEFORE CONTROLS			AFTER CONTROLS									
POLLUTANT	EF(LB/T)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)					BEFORE CONTROLS	AFTER CONTROLS	
PM	0.24	0.999	0.6000	14.4000	2.6280	0.0006	0.0026	#VALUE!					0.0000	0.0000	
PM10	0.12	0.999	0.3000	7.2000	1.3140	0.0003	0.0013	#VALUE!					0.0000	0.0000	
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A					0.0000	0.0000	
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A					0.0000	0.0000	
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A					0.0000	0.0000	
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A					0.0000	0.0000	
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A					0.0000	0.0000	

MDR is the raw material bag dumped per hour.

Recordkeeping: Monthly raw material usage.

Reporting: Quarterly report.

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**HAPs Emissions**

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HAPs emissions estimate based on 2% loss of throughput through above ground storage tanks 6-9 and the underground storage tank (UST 1).

	(HAPs emissions)
Tanks 10 & 11 contain 5482 Resin; annual through is 52,851 gal total. (1.03 sp. gr; 9.004 lbs/gal; 475,868.29 lbs) <i>toluene</i>	4.759 Tons
Tanks 12-14 contain 5465 Resin; annual throughput is 66,031 gal total. (0.924 sp. gr; 7.703 lbs/gal; 508,636.793 lbs) <i>xylene</i>	5.086
Underground Storage Tank, Compartment 1 contains Toluene; annual throughput is 49,609 gal (0.870 sp. gr; 7.253 lbs/gal; 359,823.503 lbs)	3.598
Underground Storage Tank, Compartment 2 contains Xylene; annual throughput is 14,496 gal. (0.872 sp. gr; 7.270 lbs/gal; 105,383.949 lbs)	1.054
Underground Storage Tank, Compartment 3 contains MEK; annual throughput is 26,681 gal. (0.807 sp. gr; 6.728 lbs/gal; 179,508.674 lbs)	1.795
Underground Storage Tank, Compartment 4 contains VM & P Naphtha; annual throughput is 7,595 gal. (0.750 sp. gr; 6.253 lbs/gal; 47,489.636 lbs)	0.475 (VOC)
Underground Storage Tank, Compartment 5 contains Butyl Carbitol; annual throughput is 7,000 gal (0.904 sp. gr; 7.537 lbs/gal; 52,756.536 lbs) <i>glycol ethers</i>	0.528
Underground Storage Tank, Compartment 6 contains Butyl Cellosolve; annual throughput is 7,652 gal. (0.810 sp. gr; 6.753 lbs/gal; 51,673.726 lbs) <i>ethylene glycol</i>	0.517
Underground Storage Tank, Compartment 7 contains Mineral Spirits; annual throughput is 10,220 gal. (0.806 sp. gr; 6.720 lbs/gal; 68,674.539 lbs)	0.687 (VOC)
Underground Storage Tank, Compartment 8 contains Lactol; annual throughput is 36,540 gal. (0.735 sp. gr.; 6.128 lbs/gal; 223,905.975 lbs) <i>heptane</i>	2.239
<b>Total Throughput for 1995 (baseline year) = 1,957,557.446 lbs = 978.779 Tons*</b>	<b>Total: 19.576 Tons</b>

\*Used as basis for original FESOP calculations.

\*1995 data (T/yr): 978.78

MDR (Ton/hr): 0.111732763

STACK ID (DIAM:HEIGHT): (No stack)

YEARLY PROD (T/yr): 99.25

FLOWRATE (ACFM):

Ts(°F):

CNTRL DEV: None

			PERMITTED OPERATING HRS: 8760 hr/yr								ACTUAL EMISSIONS	
			POTENTIAL TO EMIT (PTE)									
POLLUTANT	EF(LB/Ton)	CE (%)	BEFORE CONTROLS			AFTER CONTROLS					BEFORE	AFTER
			(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)			CONTROLS	CONTROLS
PM	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#DIV/0!			0.0000	0.0000
PM10	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	#DIV/0!			0.0000	0.0000
SOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	0.0000
NOx	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	0.0000
VOC	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	0.0000
CO	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A			0.0000	0.0000
HAPs	40	0	4.4693	107.2635	19.5756	4.4693	19.5756	N/A			1.9850	1.9850

Tank 10 & 11 contains 6528 Resin; annual throughput 6,900 gal total (8.10 lbs/gal; 55,890 lbs) <i>toluene</i>	0.559	Tons HAP
Tanks 12-14 contains 6509 Resin; annual throughput 31,250 gal total (7.71 lbs/gal; 240,937.5 lbs) <i>xylene</i>	2.409	Tons HAP
UST, Compartment 1 contains Toluene; annual throughput 14,393 gal total (7.25 lbs/gal; 104,349.25 lbs)	1.043	Tons HAP
UST, Compartment 2 contains Xylene; annual throughput 4,277 gal total (7.25 lbs/gal; 31,008.25 lbs)	0.310	Tons HAP
UST, Compartment 3 contains MEK; annual throughput 8,589 gal total (6.71 lbs/gal; 57,632.19 lbs)	0.576	Tons HAP
UST, Compartment 4 contains VM & P Naphtha; annual throughput 3,432 gal total (6.22 lbs/gal; 21,347.04 lbs)	0.213	Tons VOC
USTs, Compartments 5 & 6 contain Methanol; annual throughputs 5,271 & 4,874 gal total, respectively (6.63 lbs/gal; 34,946.73 lbs & 32,314.62 lbs, respectively)	0.673	Tons HAP
UST, Compartment 7 contains Mineral Spirits; annual throughput 906 gal total (6.43 lbs/gal; 5,825.58 lbs)	0.058	Tons VOC
UST, Compartment 8 contains Lactol; annual throughput 15,828 gal total (6.06 lbs/gal; 95,917.68 lbs)	0.959	Tons HAP
<b>TOTAL</b>	<b>6.529</b>	<b>Total Tons HAPs</b>

Usage for 2000: Toluene @	15057 gal/yr =	54.58 TPY	1.0916 TPY
Xylene @	4042 gal/yr =	14.65 TPY	0.293 TPY
MEK @	8961 gal/yr =	30.02 TPY	0.6004 TPY

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Combustion Units

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Unit ID: Combustion Units  
(Natural Gas Combustion)

MDC (mmBtu/hr): 4.036  
MDR (mmcft/hr): 0.0038

HEAT CONTENT (Btu/cft): 1,050  
QTY BURNED (mmcft/yr): \*Per 326 IAC 2-7-1(21)(J),  
source not required to submit emission  
information for this facility (Insig Activity).

(AP-42, Table 1.4-1, 2, & 3)			PERMITTED OPERATING HRS: 8760 hr/yr						information for this facility (Insig Activity).			
			POTENTIAL TO EMIT (PTE)									
SCC NO. 1-02-006-03			BEFORE CONTROLS			AFTER CONTROLS			ACTUAL EMISSIONS			
POLLUTANT	EF(lbs/mmcf)	CE (%)	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)	BEFORE CONTROLS	AFTER CONTROLS		
PM	12.6	0	0.0484	1.1624	0.2121	0.0484	0.2121	#DIV/0!	0.0000	0.0000		
PM10	12	0	0.0461	1.1070	0.2020	0.0461	0.2020	#DIV/0!	0.0000	0.0000		
SOx	0.63	0	0.0024	0.0581	0.0106	0.0024	0.0106	N/A	0.0000	0.0000		
NOx	105	0	0.4036	9.6864	1.7678	0.4036	1.7678	N/A	0.0000	0.0000		
VOC	6.09	0	0.0234	0.5618	0.1025	0.0234	0.1025	N/A	0.0000	0.0000		
CO	22.05	0	0.0848	2.0341	0.3712	0.0848	0.3712	N/A	0.0000	0.0000		
HAPs	0	0	0.0000	0.0000	0.0000	0.0000	0.0000	N/A	0.0000	0.0000		

(25) units -

Hot Water Heater No. 1 - 0.040 MMBtu/hr

Furnaces No. 1-8 - 0.225, 0.225, 0.160, 0.160, 0.400, 0.160, 0.320, & 0.200 MMBtu/hr, respectively

three (3) Sterling OVF175 Unit Heaters - 0.175 MMBtu/hr each

One (1) Armstrong Furnace and Air Conditioning Unit - 0.075 MMBtu/hr

One (1) Make-Up Air Unit, Model RPB - 0.2 MMBtu/hr

(2) Furnaces: 0.1 & 0.15 MMBtu/hr

(2) Furnaces: 0.125 & 0.15 MMBtu/hr for the chiller room

(1) heater: 0.1 MMBtu/hr - label room of the Latex Road Marking Paint Mfg. Op

(1) heater: 0.125 MMBtu/hr - latex room

(4) furnaces: (1) 0.125 MMBtu/hr & (3) 0.145 MMBtu/hr - New Warehouse

(1) Hot water heater: 0.036 MMBtu/hr - New Locker Room

## \*\* SOURCE TOTALS: DAVIES IMPERIAL COATINGS, INC. \*\*

POLLUTANT	POTENTIAL TO EMIT (PTE)						PERMIT LIMIT		ACTUAL	
	BEFORE CONTROLS			AFTER CONTROLS			(lbs/hr)	(TPY)	BEFORE CONTROLS	AFTER CONTROLS
	(lbs/hr)	(lbs/day)	(TPY)	(lbs/hr)	(TPY)	(gr/dscf)				
PM	35.6484	855.5624	107.3151	15.4490	18.8418	#VALUE!	10.800	47.304	11.7000	6.1336
PM10	30.0961	722.3070	90.3198	13.1364	16.0363	#VALUE!	10.800	47.304	9.9450	5.2136
SOx	0.0024	0.0581	0.0106	0.0024	0.0106	#VALUE!	N/A	N/A	0.0000	0.0000
NOx	0.4036	9.6864	1.7678	0.4036	1.7678	#VALUE!	N/A	N/A	0.0000	0.0000
VOC	37.7034	904.8818	75.3029	37.7034	75.3029	#VALUE!	5.708	25.000	11.3738	11.3738
CO	0.0848	2.0341	0.3712	0.0848	0.3712	#VALUE!	N/A	N/A	0.0000	0.0000
HAPs	4.5148	108.3546	19.6267	4.4807	19.5884	#VALUE!	5.708	25.000	2.0032	1.9896

PM: 326 IAC 6-3-2 for MDR of 4.25 Tons per hour.

PM10: set equal to PM as per HAQC Ordinance No. 3522 (as amended)

Individual HAPs limit = 10 TPY

VOC emissions from storage tanks included in the process emissions for general handling.